Bayer

Agriculture Division

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January 24, 1997

Document Processing Desk -- 6(a)(2)
Office of Pesticide Programs - H7504C
Environmental Protection Agency
401 M Street, S.W.
Washington, D.C. 20460-0001

442131-00

Subject: Admire 2 Flowable, EPA Reg. No. 3125-422
Provado 1.6 Flowable, EPA Reg. No. 3125-457
Imidacloprid; Spinach Residue Data; 6(a)(2) Submission

Dear Sir:

As a condition of California's registration of Admire 2 Flowable and Provado 1.6 Flowable on the leafy green crop group (effective July 30, 1996), Bayer was to submit residue data for spinach from three field trials. The results of three IR-4 spinach trials are contained in the enclosed Bayer Rpt. No. 107563 and summarized in Attachment 1.

The tolerance currently established for the leafy green crop group is 3.5 ppm (7-day PHI). Of the three field trials being submitted in Bayer Rpt. No. 107563, one field trial reported an average residue value of 4.22 ppm. As stated in Attachment 1, even though the one trial had residues over the established tolerance of 3.5 ppm, the application rate was higher than the maximum label rate. The samples were also collected at a 6-day PHI, instead of a 7-day PHI as required by the Provado 1.6 Flowable label. The labels for both Admire 2 Flowable and Provado 1.6 Flowable limits the maximum application to 0.5 lb AI/A, regardless of method or formulation. All three trials were conducted at a total application rate of 0.7 lb AI/A or 1.4X the maximum rate. Therefore, after correcting for an application rate of 0.5 AI/A, the average residues can be estimated to be 3.01 ppm (less than the established tolerance). In addition, the residues would be expected to be less at a 7-day PHI, than at a 6-day PHI. **Accordingly, Bayer Corporation is of the opinion that using the maximum labeled application rates, at the allowable 7-day pre-harvest interval, will not result in residues over the established tolerance value.**

Sincerely,

BAYER CORPORATION
AGRICULTURE DIVISION

John S. Thornton
Director, Product Registrations
and Regulatory Affairs

MKT752

cc: Dr Keith Dorschner

Enclosure: Bayer Rpt. No. 107563
Attachment: Summary of Spinach California Field Trials, dated January 22, 1997

1 of 2

TRANSMITTAL DOCUMENT

1. Name and Address of Submitter:

Bayer Corporation
Agriculture Division
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John S. Thornton
Director, Product Registrations
and Regulatory Affairs
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2. Regulatory Action in Support of Which This Package is Submitted:

Admire 2 Flowable, EPA Reg. No. 3125-422
Provado 1.6 Flowable, EPA Reg. No. 3125-457
Imidacloprid
Spinach Residue Data
6(a)(2) Submission

3. Transmittal Date: January 24, 1997

4. List of Submitted Studies:

MRID No.	Study No.	
442131-01	1	"Imidacloprid (NTN 33893): Magnitude of the Residue on Spinach," EPA Guideline No. 171-4(k), Bayer Report No. 107563, C.R. Hackert Anderson, 98 p.